

RECEIVED UNITED STATES DISTRICT COURT

APR 01 2020 EASTERN DISTRICT OF MISSOURI

BY MAIL EASTERN DIVISION

UNITED STATES
Plaintiff

No. 4:18-cr-332 - RLW

v.

WILLIAM ANDERSON
Defendant

Emergency Motion for Pre-Trial Release

Now Comes the defendant William Anderson in propria persona sui juris, to move this court to immediate release due to the risks of complications from potential covid-19 infection, medical conditions, and other compelling reasons to temporarily release the defendant from custody.

Pursuant to title 18 USC §3142(i)(4) 1) The danger posed to the defendant in Ste. Genevieve County Jail by covid-19 pandemic constitutes an independent compelling reason to temporarily release from custody, with addition the defendant's underlying medical condition of asthma which the covid-19 virus attacks the respiratory system, stress, depression, and anxiety. On March 23, 2020 CDC acknowledged that correctional and detention facilities present unique challenges for control of covid-19 transmission among incarcerated

detained persons, staff, and visitors. Specifically the CDC noted that many detention conditions create a heightened risk of danger to detainees, these includes low capacity for patient volume, insufficient quarantine space, insufficient on site medical staff, highly congregational environments, inability of most patients to leave the facility and limit ability of incarcerated/detained persons to exercise effective disease prevention measures (e.g. social distancing, frequent handwashing, alcohol based hand sanitizers, and alcohol based cleaning supply.) see <https://www.cdc.gov/coronavirus/2019-nCoV/community/correction-detention/guidance-correctional-detention.html>. On March 26, 2020 Attorney General William Barr issued a separate directive ordering the Director of Bureau of Prison to prioritize home confinement as appropriate in response to the covid-19 pandemic for Federal Prisoners and jail inmates. Also the covid-19 pandemic poses a threat to the defendant's ability to prepare for his case, due to the facts of the USMS restriction on visitations, the Federal Public Defenders working from ^{home} which is making it impossible for the defendant to get in contact with legal counsel. United States v. Barkman no. 19-cr-0032 2020 US Dist. LEXIS 45628 at *11 (D. Nev. 3-17-2020) (granting emergency relief amnd probation order to delay confinement for thirty days because of risks of infection to both defendant and other inmates in county jail.)

Belief

Requesting immediate release, GPS, and home confinement, and whatever requirements of release the court deems necessary.

I declare under penalty of perjury that the foregoing is true and correct.

Thank you-
William Stand
3-30-2020

Affidavit In Support of Motion

see Henry A. Fellela -case no.3:19-cr-79 (JAM)

see Samuel Mullet -case no.3:11-cr-594

see Keith Kennedy -case no. 18-20315 (E.D. Mich.2020)

The seemingly preemptive nature of Defendant's release renders it no less necessary or compelling. To the contrary-as the above background makes clear -waiting for either Defendant to have a confirmed case of Covid-19, or for there to be a major outbreak in Defendant's facility would render meaningless this request for release. Such a failure to act could have devastating consequences for defendant and would creates serious medical and security challenges to the existing prison population and the wider community.

I declare under penalty of perjury that the foregoing is true and correct.

Thank you
Dillenstad

CERTIFICATE OF SERVICE
FOR PRO SE DOCUMENTS

On the 31th day of March, 2010, the undersigned party served the following document or documents (list documents):

Emergency motion for Pre-trial Release, Affidavit in Support of Motion.

on (list names and addresses of parties or attorneys):

United States, 111 South 10th Street St Louis MO 68102

by delivering a copy by (state how you served the document, such as U.S. Mail):

U.S. Mail

William Anderson
(Signature)

William Anderson
(Print or Type Name)

William Anderson #6845
5 Foster Drive
Ste. Genevieve MO, 65247-0

31 MARCH 2020 PMG FOREVER
USA

United States District Court

Clerk

111 South 10th Street
St. Louis MO 63102

MAILED FROM
STE GENEVIEVE
COUNTY
DETENTION CENTER

RECEIVED
APR 01 2020
BY MAIL

Barn Swallow



63102-112599